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Air Cargo Security Requirements
Notice of Proposed Rule Making

In support of the Transportation Security Administration's (TSA) efforts to enhance cargo security Ted Stevens Anchorage International Airport (ANC) would like to submit the following comments regarding the Air Cargo Security Requirements NPRM.

ANC concurs with the comments submitted by AAIE and ACI-NA, with the exception of suggesting an alternative method of defining which areas should be classified SIDA under 1542.205 below. ANC summarizes its comments by recommending that DHS and TSA adopt a threat based cost benefit analysis.

1542.205 proposes expansion of the Security Identification Display Area (SIDA). ANC feels this provision would result in more costs without a measurable increase in security as a result. Cargo facilities at ANC are highly secured establishments without their being declared a SIDA.

As an alternate plan ANC proposes that the local FSD determine which if any areas need to be classified as SIDA.

1544.228 proposes several new requirements among them the Security Threat Assessment as one option for granting unescorted access to cargo. If the SIDA were expanded to include cargo sort areas then why would TSA allow anything less than the current Criminal History Records Check (CHRC) to be acceptable for unescorted access? It is estimated that at ANC, a relatively small Cargo Origin and Destination market, this could apply up to 2,000 individuals.

1548 et al proposes many new requirements which will have a significant economic impact on the Indirect Air Carriers (IAC). Many IACs are small companies without the staff or budget to implement such extensive requirements. One IAC has indicated the literal implementation of this provision could put his company out of business. Such a provision may be appropriate,

but ANC feels only if the benefits to reducing the security threat is quantified and determined to be worth the cost to small business survivability.

These comments reflect discussion at the Ted Stevens Anchorage International Airport Air Cargo Security Working Group meeting of December 2004. Participants included air carriers, IACs, TSA and ANC personnel.

Additionally, ANC feels any effort to enhance security should first have to meet some rudimentary standard of benefit to cost ratio. While many actions might be taken that could incrementally increase the level of safety for either passenger or cargo air travel, the cost of implementing many of them far outweighs the small increase in security that they attain.

When reviewing this NPRM and future NPRMs aimed at increasing air transportation security the potential risk (cost of an event times the likelihood) should be compared to the cost of implementing the preventive measures. Spending billions of dollars to prevent an incident that might cause millions of dollars in damage simply does not make economic sense. If we overreact to every phantom threat that we can imagine, we will soon run out of resources and be unable to defend ourselves from potentially disastrous threats because we have tried to defend ourselves from every possible threat. Taking limited resources away from the passenger terminals and passenger air carriers means we will be more vulnerable in these very areas that the FAA/TSA has claimed needed to be the most secure. A cost benefit analysis is needed prior to adopting the proposed measures and measures that may be proposed in the future.

Thank you for the opportunity to present comments from Ted Stevens Anchorage International Airport on the air cargo security NPRM under consideration.

Sincerely,
Morton V. Plumb Jr.
Director
Ted Stevens Anchorage International Airport